

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BRITANNY HAMILTON, ET AL. : NO.: 17-CV-6384-AMD-RLM

Plaintiff,

vs.

DET. LOUIS SCARCELLA, ET AL., : MARCH 22, 2018

Defendants.

**PLAINTIFFS BRITTANY HAMILTON, RICHETTA GREENE and DAVONE
GREENE'S INITIAL DISCLOSURES**

PLEASE TAKE NOTICE that plaintiffs **Brittany Hamilton, Richetta Greene and Davone Greene**, by their attorney, Paul Cordella, pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) and the Court's Initial Conference Order [Doc. 10], upon information and belief, hereby submits his initial disclosures as follows:

(i) the name and, if know, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

1. **Brittany Hamilton, plaintiff;**
2. **Richetta Greene, plaintiff;**
3. **Davone Greene, plaintiff;**
4. **Former New Haven Police Officer William (“Billie”) White, defendant and witness**
believed to have knowledge regarding the Nathaniel Cash and the arrest and prosecution of
Derrick Hamilton;

5. Retired NYPD Detective Frank DeLouisa, defendant and witness believed to have knowledge regarding the investigation of the shooting death of Nathaniel Cash and the arrest and prosecution of Derrick Hamilton;
6. Retired NYPD Detective Louis Scarcella, defendant and witness believed to have knowledge regarding the investigation of the shooting death of Nathaniel Cash and the arrest and prosecution of Derrick Hamilton;
7. Former Kings County District Attorney Investigator Joseph Ponzi, defendant and witness believed to have knowledge regarding the investigation of the shooting death of Nathaniel Cash and the arrest and prosecution of Derrick Hamilton;
8. Taseem Douglas, Mullshire Lane, Willingboro, New Jersey 08046, non-party witness believed to have knowledge regarding the shooting death of Nathaniel Cash;
9. Mattie Dixon, 183 Diamond Street, New Haven, CT 06515, nonparty witness believed to have knowledge regarding relationship between Derrick Hamilton and Alphonso Dixon and Alphonso Dixon's work as a confidential informant for the City of New Haven;
10. Kelly Turner, non-party witness believed to have knowledge of Derrick Hamilton's whereabouts at the time of Cash murder;
11. Davette Mahan, non-party witness believed to have knowledge of Derrick Hamilton's whereabouts at the time of Cash murder;
12. Tashamaeka Watson, non-party witness believed to have knowledge of Derrick Hamilton's whereabouts at the time of Cash murder;
13. Derrick Hamilton, 2517 Dunksfeny Road, Apt. E302, Bensalem, PA 19020, non-party witness believed to have knowledge of his arrest, prosecution, incarceration and familial relationships.

14. **Individuals presently unknown whose identity will be disclosed during discovery;**
15. **Any individuals named in plaintiff's Rule 26(A)(1)(A) disclosures and any subsequent supplement disclosures made by plaintiff; and**
16. **Any individuals named in plaintiff's Rule 26(A)(1)(A) disclosures and any subsequent supplement disclosures made by plaintiff.**

(ii) a copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

1. **Transcripts of deposition of Derrick Hamilton (No. 1:15 CV 4574 (CBA)(VMS));**
2. **Transcript of deposition of Davette Mahan (id.);**
3. **Transcript of deposition of Kelly Turner (id.);**
4. **Transcript of deposition of Tashameaka Watson (id.);**
5. **Transcript of deposition of Taseem Douglas (id.);**
6. **Transcript of deposition of Mattie Dixon (id.);**
7. **Transcript of deposition of Detective Scarcella (id.);**
8. **Affidavit of Mattie Dixon (10/31/09);**
9. **Affidavit of Kelly Turner (6/15/95);**
10. **Affidavit off Davette Mahan (6/15/95);**
11. **Affidavit of Tashameaka Watson (2/18/10);**
12. **Transcript of Section 440 motion hearing (1995); and**
13. **Memorandum of Decision re Section 440 motion (10/16/95).**

(iii) A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

Damages in excess of \$75,000 for each count alleged.

(iv) for inspection and copying under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Not applicable.

PLAINTIFFS

**Brittany Hamilton, Richetta Greene, and
Davone Greene**

BY: /ss/ Paul R. Cordella

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Docket No.17-CV-6384-AMD-RLM

UNITED STATE DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

Bittany Hamilton, Richetta Greene and Davone Greene,

Plaintiff(s),

- against -

Det. Louis Scarcella, Individually and in his capacity as a New York City Police Officer, Det. Frank DeLouisa, Individually and in his capacity as a New York City Police Officer, Inv. Joseph Ponzi, Individually and in his capacity as an investigator for the Kings County District Attorney's Office and Police Officer William "Billy" White, Individually and in his capacity as a New Haven Police Officer,

Defendant(s).

INITIAL DISCLOSURES

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